



IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,
Plaintiff,

v.

NELLY N. ANQUEIRA,
Defendant.

INFORMATION

CRIMINAL NO. 25-253-MAJ

18 U.S.C. § 641

ONE COUNT

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE

**Theft of Government Property
(18 U.S.C. § 641)**

Between on or about June 1, 2023, and continuing through on or about June 30, 2024, in the District of Puerto Rico, the defendant,

NELLY N. ANQUEIRA,

knowingly and willfully embezzled, stole, and converted to her own use or the use of another, money of the Social Security Administration (SSA), a department or agency of the United States, namely payments issued by the United States Department of Treasury, on behalf of the Social Security Administration, which payments were made payable to individual with initials F.A.S., to which she knew she was not entitled, having a value in excess of \$1,000.00, that is, approximately \$11,835.00. In violation of 18 U.S.C. § 641.

United States v. Nelly N. Anqueira
Information

FORFEITURE ALLEGATION

Upon conviction of the offense in violation of 18 U.S.C. § 641, charged in Count One of this Information, the defendant, NELLY N. ANQUEIRA, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, that constitutes, or is derived from, proceeds traceable to the commission of the offense, including but not limited to approximately \$11,835.00 in United States currency.

If any of the property described in paragraph 1 hereof as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of this Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to 28 U.S.C. § 2461(c), incorporating 21 U.S.C. § 853(p), to seek forfeiture of substitute property. All pursuant to 18 U.S.C. § 981 and 28 U.S.C. § 2461(c).

W. STEPHEN MULDROW
United States Attorney



Seth A. Erbe
Assistant United States Attorney
Chief Financial Fraud and Public Corruption
Unit



Vanessa D. Bonano-Rodríguez
Special Assistant United States Attorney